WILLIAM L. JUSKA, JR. JAMES L. ROSS* ERIC E. LENCK JOHN J. WALSH PETER J. GUTOWSKI WAYNE D. MEEHAN* DON P. MURNANE, JR.4 THOMAS M. RUSSO THOMAS M. CANEVARIT JOHN F. KARPOUSIS* MICHAEL E. UNGER*† WILLIAM J. PALLAS* GINA M. VENEZIA®A JUSTIN T. NASTRO* MANUEL A. MOLINA DANIEL J. FITZGERALD*14 BARBARA G. CARNEVALE* ERIC J. MATHESON' MICHAEL D. TUCKER* RYAN BYRNES* WILLIAM H. YOST J. TANNER HONEA* YAAKOV U. ADLER MICHAEL J. DEHART ADAM DEITZT MATTHEW J. PALLAY* CODY KING

LAW OFFICES OF FREEHILL HOGAN & MAHAR LLP 80 PINE STREET

NEW YORK, N.Y. 10005-1759

TELEPHONE (212) 425-1900 FACSIMILE (212) 425-1901

MEMORANDUM ENDORSED

ELECTRONICALLY FILED

12/19/2019

USDC SDNY DOCUMENT

DATE FILED:

DOC #:

E-MAIL: reception@freehill.com

www.freehill.com

December 18, 2019

* ALSO ADMITTED IN NEW JERSEY

† ALSO ADMITTED IN CONNECTICUT ALSO ADMITTED IN WASHINGTON, D.C.

ALSO ADMITTED IN LOUISIANA
 ALSO ADMITTED IN PENNSYLVANIA

ALSO ADMITTED IN TEXAS

Via ECF

Honorable Gregory H. Woods United Stated District Judge United States District Court Southern District of New York U. S. Courthouse -500 Pearl Street New York, New York 10007-1312

Re:

Bouchard Transportation v. Laurel Shipping LLC and Gulf Oil LP 1:19-cv-9559-GHW

Dear Judge Woods:

We represent Plaintiff, Bouchard Transportation Co., Inc., in the above-captioned matter. With the consent of defense counsel, we write to request an adjournment of the initial pre-trial conference scheduled for January 6, 2020 in this matter to January 23rd or as soon thereafter as may be convenient for the Court, and an accompanying adjournment of the due date for filing the proposed Civil Case Management Plan and Scheduling Order and the joint letter to the court advising the court on the status of the case.

Since the filing of the Complaint, defense counsel and I have been engaged in discussions over the substantive aspects of this case in an effort to reach a resolution. We thought that possible resolution would obviate the need to prepare a joint status letter and a Civil Case Management Plan and Scheduling Order. We are attempting to prepare same at this moment, but due to the holidays, we do not believe we will be able to finish the proposed Case Management Plan and Scheduling Order and joint status letter by December 30, 2019.

Perhaps more importantly, my daughter is due to deliver her first child (and my first grandchild) in Florida on January 6, 2020. I promised her that I would be there for the event.

We would be grateful for a two week adjournment of the pre-trial conference to January 23, 2020, or as soon thereafter as may be convenient for the Court, with a concomitant extension of the deadline for a proposed Civil Case Management Plan and Scheduling Order and joint status letter.

This is the first request for an adjournment. We are grateful for the court's attention to this matter.

Respectfully,

FREEHILL, HOGAN & MAHAR LLP

John J. Walsh

JJW:ac

cc: Via ECF

Francis C. Healy, Esq. Stroock, Stroock & Lavan LLP

180 Maiden Lane

New York, New York 10038

Application granted. The initial pretrial conference scheduled for January 6, 2020 is adjourned to February 3, 2020 at 3 p.m. The joint letter and proposed case management plan discussed in the Court's October 18, 2019 order, Dkt No. 8, is due no later than January 27, 2020.

SO ORDERED.

Dated: December 18, 2019 New York, New York GREGORY H. WOODS
United States District Judge